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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

NATIONAL URBAN LEAGUE, et al.,

Plaintiffs,

v.

GINA RAIMONDO, et al.,

Defendants.

CASE NO. 5:20-cv-05799-LHK

**JOINT CASE MANAGEMENT
STATEMENT**

Date: April 16, 2021

Time: 10:00 a.m. PST

Place: Courtroom 8

Judge: Hon. Lucy H. Koh

Pursuant to Civil Local Rule 16-10(d) and the Court's April 2, 2021 Order (Dkt. 480), the parties to this action, by their respective counsel, respectfully submit the following Joint Case Management Statement in anticipation of the Further Case Management Conference scheduled for April 16, 2021 at 10:00 a.m. The parties have negotiated an agreement in principle for resolution of this matter, but still need a short amount of time for all parties to obtain approval of that agreement in principle. The parties believe they are likely to obtain final approvals within 7 days, and thus request a further 7-day stay of the case. Additionally, in light of the agreement in principle, Defendants also request a further 7-day stay of further proceedings on Plaintiffs' Motion to Compel and for Sanctions, currently stayed until April 16, 2021, pursuant to the Court's April 2, 2021 Order (Dkt. 480).

The parties propose that the case management conference scheduled for April 16, 2021, be continued to April 23, 2021, although the parties will alert the court if they are able to obtain final approvals before that date.

I. REQUEST FOR A FURTHER 7-DAY STAY OF LITIGATION TO ALLOW FOR FINAL APPROVALS OF AGREEMENT IN PRINCIPLE AMONG THE PARTIES

After diligently and actively working towards reaching a resolution of this matter, the parties have negotiated an agreement in principle, subject to final approval by plaintiffs and the Department of Justice. *See generally* 28 C.F.R. Subpart Y (setting forth Department of Justice settlement authority). The parties believe that it is in the best interests of the parties and the public to stay further proceedings in this case to allow for these approvals, which the parties anticipate will allow for a resolution of this case. The proposed 7-day stay would apply to any outstanding obligations to the Court, including Plaintiffs' Renewed Motion to Compel and deferred ruling on their Motion for Sanctions (Dkt. 462), as well as to all outstanding discovery.

The parties agree that nothing in this Joint Case Management Statement or in the representations made by either party during their ongoing discussions shall apply to change or limit Defendants' obligations to respond to information requests from Congress, the Office of Inspector General, or the Government Accountability Office.

The parties therefore request a stay of all proceedings and obligations not otherwise specifically addressed in this Case Management Statement until April 23, 2021. The parties request that the Court continue the Case Management Conference currently scheduled for Friday, April 16, 2021, until Friday, April 23, 2021.

2. EXPIRATION OF THE REQUESTED STAY

Defendants acknowledge and represent that, should the parties not reach resolution (or request an additional stay) and the case restarts once the 7-day stay is lifted (under the exact same schedule currently in place, continued by 7 days), Defendants will not resist or challenge any of their discovery obligations or depositions as a result of the scheduling stays in this case, but Defendants reserve their rights to assert the objections that they would have had in the normal course.

The parties propose providing a Joint Case Management Statement on April 22, 2021, at 2:00 p.m. PDT, the day before the conclusion of the proposed 7-day stay, should the Court enter a stay.

Dated: April 15, 2021

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ATTESTATION

I, Sadik Huseny, am the ECF user whose user ID and password authorized the filing of this document. Under Civil L.R. 5-1(i)(3), I attest that all signatories to this document have concurred in this filing.

Dated: April 15, 2021

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